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*Attorneys for Plaintiff, Unigestion Holdings, S.A.,
a foreign corporation, d/b/a Digicel Haiti*

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

**UNIGESTION HOLDINGS, S.A., d/b/a
DIGICEL HAITI,**

Plaintiff and Counterclaim
Defendant,

v.

UPM TECHNOLOGY, INC., et al.,

Defendants and Counterclaim
Plaintiffs.

No. 3:15-cv-00185-SI

**PLAINTIFF UNIGESTION HOLDINGS,
S.A., D/B/A DIGICEL HAITI'S SECOND
AMENDED PHASE I TRIAL EXHIBIT
LIST**

UNIGESTION HOLDINGS, S.A.'S SECOND AMENDED
PHASE I TRIAL EXHIBIT LIST

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Pursuant to the Court's Civil Trial Management Order (ECF 191), Plaintiff Unigestion Holdings, S.A., d/b/a Digicel Haiti ("Digicel Haiti") hereby submits its Second Amended Phase I trial exhibit list.

Digicel Haiti reserves the right to offer any exhibits listed by Defendants UPM Technology, Inc. ("UPM") and Duy Tran ("Tran") (collectively "Defendants"), the right not to offer any exhibits listed below, and the right to add to, revise, or delete from this list as issues are identified or in response to court orders during pretrial proceedings. Demonstrative, rebuttal, and impeachment exhibits are not listed, pursuant to court orders for local practice.

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
1.	INTENTIONALLY LEFT BLANK			
2.	INTENTIONALLY LEFT BLANK			
3.	INTENTIONALLY LEFT BLANK			
4.	INTENTIONALLY LEFT BLANK			
5.	INTENTIONALLY LEFT BLANK			
6.	Declaration of G. Laborde ISO Plaintiff's Motion for Summary Judgment Re: Counterclaims (with exhibits) [DE 265]			
7.	UPM's Shipping Standard Operating Procedure (Baltazar Ruiz Depo Exhibit 1 - UPM 30(b)(6) Exhibit 25)			
8.	Email dated 11-1-12 from B. Ruiz to D. Johnson & D. Tran re Shipping SOP (Baltazar Ruiz Exhibit 2; UPM 30(b)(6) Exhibit 24)			
9.	Email dated 11-1-12 from B. Ruiz to M. Toro re SOP			
10.	Email dated 1-10-15 from B. Chase to B. Ruiz re Haiti Natcom Redials			
11.	Email dated 12-17-14 from B. Ruiz to A. Konstantinov re. Gateway configuration for incoming calls termination re. Development list			
12.	Email dated 11-28-14 from S. Spatar to J. Gosal re: Development list			
13.	Email dated 9-27-14 from J. Kohn to G. Alvarez re: Haiti Inband – Update			
14.	Email dated 9-15-14 from G. Alvarez to Jack and Sales Re: UPM-HT Digicel ABR 0-1 %			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
15.	Email dated 9-14-14 from B. Ruiz to Jack			
16.	Email dated 9-3-14 from B. Ruiz to M. Doan			
17.	Email dated 8-26-14 from M. Doan to B. Ruiz (Baltazar Ruiz Exhibit 11 - UPM 30(b)(6) Exhibit 36)			
18.	Video Vizion Card			
19.	Email dated 8-15-14 from K. Rohner to NOC & UPM.Shipments			
20.	Shipping Documents incl. DHL Shipping Label from B. Ruiz to J. Louis dated 8-13-14 with Certificate of Origin, and Commercial Invoice (Baltazar Ruiz Exhibit 14 - UPM 30(b)(6) Exhibit 29)			
21.	Email dated 4-28-14 from J. Gutierrez to J. Kohn			
22.	Email dated 4-26-14 from V. Kapustin to B. Ruiz			
23.	Email dated 10-17-13 from B. Ruiz to B. Sanchez			
24.	-UPM's Excel Spreadsheet (Exhibit 1)			
25.	UPM's Organizational Chart			
26.	Email dated 9-25-11 from D. Yannoucos to E. Machuca			
27.	Email dated 9-27-11 from T. Giang to J. Flores re SIM Reports			
28.	Email dated 12-6-11 from J. Gosal to E. Machuca			
29.	Email dated 12-20-11 from E. Machuca to E. Illescas			
30.	Email dated 1-17-12 from V. Moscoso to E. Machuca			
31.	Email dated 2-15-12 from E. Machuca to E. Illescas			
32.	Email dated 2-29-12 from E. Machuca to J. Gosal			
33.	Email dated 3-16-12 from E. Machuca to G. Rubio (Esther Machuca depo Exhibit 10 - UPM 30(b)(6) Exhibit 16)			
34.	INTENTIONALLY LEFT BLANK			
35.	Email dated 7-21-11 from J. Gosal to J. Kohn			
36.	Email dated 8-4-11 from J. Gosal to J. Johnson			
37.	Email dated 8-4-11 from J. Kohn to J. Gosal			
38.	Email dated 8-11-11 from J. Gosal to Edgar			
39.	Email dated 8-19-11 from D. Tran to J. Gosal			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
40.	Email dated 8-26-11 from D. Tran to J. Gosal			
41.	Email dated 9-10-11 from D. Yannoucos to J. Gosal			
42.	Email dated 9-21-11 from J. Gosal to K. Rohner			
43.	Email dated 9-21-11 from K. Rohner to D. Tran			
44.	Email dated 9-23-11 from D. Tran to S. Del Toro			
45.	Email dated 10-28-11 from J. Gosal to V. Moscoso			
46.	Email dated 11-2-11 from S. Spatar to J. Gosal			
47.	Email dated 11-29-11 from J. Gosal to V. Moscoso			
48.	Email dated 6-10-14 from M. Baker to D. Tran			
49.	Email dated 5-14-12 from G. Morales to K. Rohner			
50.	Email dated 8-7-12 from J. Gosal to G. Morales			
51.	Email dated 12-2-11 from J. Gosal to T. Allen			
52.	Email dated 12-22-11 from D. Tran to L. Lhernitte			
53.	Email dated 2-13-12 from D. Kunilov to J. Gosal			
54.	Email dated 3-21-12 from D. Floeckinger to D. Tran			
55.	Email dated 5-9-12 from J. Gosal to D. Tran			
56.	UPM's Write-off Authorization Form			
57.	Email dated 4-15-14 from B. Tran to J. Gosal			
58.	Email dated 8-13-14 from T. Allen to M. Doan re GW shipment			
59.	Email dated 4-26-14 from Wrangler1480 to V. Moscoso			
60.	Email dated 5-7-14 from B. Sanchez to D. Teo			
61.	Email dated 7-10-14 from J. Gosal to D. Johnson			
62.	Email dated 7-20-14 from V. Moscoso to D. Tran			
63.	Email dated 7-20-14 from G. Alvarez to D. Tran			
64.	Email dated 8-10-14 from D. Tran to D. Floeckinger			
65.	Email dated 12-10-14 from D. Johnson to B. Ruiz			
66.	Digicel Haiti - Roam Like You're Home T&C Webpage dated 2-12-15			
67.	Email dated 4-5-15 from A. Xela to D. Tran			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
68.	Email dated 4-13-15 from A. Smith to D. Tran			
69.	INTENTIONALLY LEFT BLANK			
70.	Email dated 4-13-15 from A. Smith to D. Tran			
71.	Letter dated 4-29-2016 from C. Hogan to K. Salyer			
72.	CONFIDENTIAL - UPM Marketing Inc. /ADC Carrier Services Agreement			
73.	CONFIDENTIAL – Vodacode Telecommunications Services Agreement			
74.	FCC Consumer Guide - Cell Phone Fraud (last reviewed 4-21-20)			
75.	Declaration of T. Allen ISO Individual Defendant's Motion for Summary Judgment [DE 263]			
76.	Email dated 4-14-14 from T. Allen to O. Jimenez re GW shipment			
77.	Email dated 5-26-14 from G. Morales to J. Gosal			
78.	Email dated 7-18-14 from T. Allen to NOC@UPMtelecom & B. Ruiz			
79.	Email dated 8-4-14 from P. Claassen to B. Ruiz			
80.	Email dated 8-18-14 from T. Allen to UPM.Shipments			
81.	Email dated 9-9-14 from G. Morales to B. Ruiz			
82.	Digicel Haiti Client Registration Form (DE 104-1-Exhibit A to 2nd Complaint)			
83.	Digicel Bulletin and Attached Conatel Circular (DE 104-2-Exhibit B to 2nd Complaint)			
84.	Proof of Wire Transfers to Moscoso (DE 104-3-Exhibit C to 2nd Complaint)			
85.	DHL Shipping Slip to Sanchez (DE 104-4-Exhibit D to 2nd Complaint)			
86.	DHL Shipping Slip to Sanchez (DE 104-5-Exhibit E to 2nd Complaint)			
87.	DHL Shipping Slip to Sanchez (DE 104-6-Exhibit F to 2nd Complaint)			
88.	DHL Shipping Slip to Outger from Ruiz (DE 104-7-Exhibit G to 2nd Complaint)			
89.	DHL Shipping Slip to Sanchez from Outger (DE 104-8-Exhibit H to 2nd Complaint)			
90.	DHL Shipping Slip From Outger to Allen (DE 104-9-Exhibit I to 2nd Complaint)			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
91.	Shipping Certificate of Origin to Outger from Ruiz (DE 104-10-Exhibit J to 2nd Complaint)			
92.	DHL Shipping Slip from Outger to Allen (DE 104-11-Exhibit K to 2nd Complaint)			
93.	DHL Shipping Slip from Outger to Allen (DE 104-12-Exhibit L to 2nd Complaint)			
94.	(DHL Shipping Slip from Outger to Allen) DE 104-13-Exhibit M to 2nd Complaint			
95.	Email dated 8-25-14 Re: Invoice that was sent with Haiti GWs			
96.	Video Vizion Invoice 8/15/2014			
97.	Email dated 8-6-14 Re: Haiti recharges wrong amount			
98.	Email dated 8-6-14 Re: Haiti recharges wrong amount			
99.	Email dated 9-15-14 Re: UPM-HT Digicel ABR 0-1 %			
100.	Shipping SOP			
101.	Email dated 9-12-14 Re: Haiti Natcom-Digicel/ UPDATE			
102.	Email dated 8-15-14 Re: [#UPM-000-10047]: shipment to Haiti Gw's 8 ports Andrew Smith			
103.	Video Vizion Photo			
104.	Email dated 8-15-14 Re: Fwd: [#UPM-000-10047]: shipment to Haiti Gw's 8 ports Andrew Smith			
105.	Email dated 9-12-14 Re: Haiti Natcom-Digicel/ UPDATE			
106.	Email dated 8-29-11 Re: IMPORTANT: EMIDA 5 DIDNT GO THROUGH Re: 8 DIGICEL HAITI EMIDA-Recharge with \$10.00 Aug 29th by dEIBY			
107.	Email dated 12-17-14 Re: Gateway configuration for incoming calls termination			
108.	Email dated 8-5-14 Re: [Prepay Nation] Re: Haiti Mobile Digicel - Receiving 937.00 HTG instead of 1000 HTG			
109.	Email dated 7-21-14 Re: Haiti sims			
110.	Email dated 12-17-14 Re: Gateway configuration for incoming calls termination			
111.	Email dated 8-12-11 Re: Haiti Digicel tarifas			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
112.	Email dated 4-19-11 Re: [iQsim] T#27857<WEB>Sim Array and DB Problem			
113.	Email dated 2-21-12 Re: Discrepancies SIM REPORT HAITI.			
114.	Sim Report			
115.	Email dated 2-28-12 Re: Discrepancies HAITI Report			
116.	SIM Report			
117.	Email dated 11-16-11 Re: puertos digicel haiti			
118.	Email dated 9-12-14 RE: Haiti Natcom-Digicel/UPDATE			
119.	Email dated 5-9-14 Re: Sim batches -vendor add			
120.	Email dated 12-11-11 Re: HAITI DIGICEL			
121.	Email dated 12-12-11 Re: Sim Report Haiti Digicel.			
122.	SIM Report			
123.	Email dated 3-5-12 Re: Digicel Haiti -			
124.	Email dated 4-15-14 Re: New Vendor - Haiti			
125.	Email dated 12-30-14 Re: Top up rates - December 30 2014 - Haiti reseller discount			
126.	Email dated 7-9-14 Re: Purchase Order Voided			
127.	Email dated 9-28-14 Re: Top up rates - September 28 2014 - Haiti			
128.	Email dated 4-15-14 Re: New Vendor - Haiti			
129.	Email dated 4-15-14 Re: New Vendor - Haiti			
130.	Email dated 6-3-14 Re: Tracking Shipment 2 Gw's 8 ports to Haiti Outger			
131.	Email dated 7-10-14 Fwd: -Haitian escapade			
132.	Email dated 5-29-14 Re: Documenting Outger Maceus Sim status			
133.	Email dated 3-11-15 Re: Haiti digicel			
134.	Email dated 8-5-14 Re: [Prepay Nation] Haiti Mobile Digicel - Receiving 937.00 HTG instead of 1000 HTG			
135.	Email dated 7-21-11 Re[4]: Project POs paid in Guatemala			
136.	Email dated 7-7-15 Re: Jean Louis Samuel 2014 Balance - Write off			
137.	Attachment to Exhibit 136 - UPM Telecom Inc. Write Off Authorization Form dated 6-1-15			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
138.	Email dated 8-25-14 Re: [#UPM-000-10047]: shipment to Haiti Gw's 8 ports Andrew Smith			
139.	Email dated 4-14-14 Re: Recharge Haiti			
140.	Email dated 4-15-14 Re: New Vendor - Haiti			
141.	Email dated 8-13-14 Fwd: Wire Transfer Request for Haiti			
142.	Email dated 8-13-14 Re: Wire Transfer Request for Haiti			
143.	Email dated 8-13-14 FW: Wire Transfer Request for Haiti			
144.	Email dated 10-19-11 Re HAITI DIGICEL			
145.	Attachment to Exhibit 144 - Documenting SIM Card Blocking (Spanish)			
146.	Email dated 8-13-14 Re: Wire Transfer Request for Haiti			
147.	Email dated 9-12-14 Re: Haiti Natcom-Digicel/ UPDATE			
148.	Email dated 4-26-14 Re: Haiti Digicel new setup			
149.	Email dated 4-25-14 Re: Haiti Digicel new setup			
150.	Email dated 8-13-14 Re: Wire Transfer Request for Haiti			
151.	Email dated 9-12-14 Fwd: Haiti Natcom-Digicel/ UPDATE			
152.	Email dated 8-11-11 Re: SIM Cards (Digicel)			
153.	Email dated 10-4-16 Fwd: Digicel FX Rates - October			
154.	Email dated 11-16-11 Re: 40 HAITI DIGICEL UPM Scratch Pins x 2.5 Nov 16 by DEIBY			
155.	Email dated 11-9-11 RE: shipment GT to Haiti 1 teles IGate 13-oct-2011			
156.	Attachment to Exhibit 65 – UPM's NOC Organizational chart 2015			
157.	Email dated 12-6-14 from B. Ruiz to D Kunilov, D. Johnson, M. del Toro, and J. Gosel re: NOC Org chart 2015			
158.	Attachment to Exhibit 157 - NOC Organizational chart 2015			
159.	Email dated 11-8-11 RE: shipment GT to Haiti 1 teles IGate 13-oct-2011			
160.	Email dated 9-21-11 Re: 300 pins Digicel Haiti \$2.50 entered 5-sep-2011			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
161.	Email dated 7-21-14 from B. Ruiz to GW Support re: Add HT-US-02-#T00344 to production			
162.	Email dated 11-7-11 Re: shipment GT to Haiti 1 teles IGate 13-oct-2011			
163.	Email dated 8-25-14 Re: Invoice that was sent with Haiti GWs			
164.	Document Placeholder - Haiti Traffic Report from Mera CDRs – v3			
165.	Haiti Traffic Report from Aug-2011 through Nov-2014			
166.	Email dated 8-19-20 Re: Haiti - Voice traffic reports			
167.	Email dated 12-17-14 Fwd: Re: Gateway configuration for incoming calls termination			
168.	Haiti Traffic Report from Aug 2011 through Nov-2014			
169.	Email dated 8-26-14 Fwd: 1st gw installed in Haiti			
170.	NOC Organizational Chart			
171.	Email dated 9-19-11 RE: Sims/Pins Haiti			
172.	Email dated 9-19-11 RE: Sims/Pins Haiti			
173.	Email dated 7-3-14 RE: Prepaynation Debit advice; Sales Invoice # 72942 - Invoice Dispute			
174.	Attachment to Exhibit 13 – Recharge/Usage report			
175.	Email dated 12-8-14 Fwd: NOC Org chart 2015			
176.	Email dated 7-7-14 RE: Prepaynation Debit advice; Sales Invoice # 72942 - Invoice Dispute			
177.	Attachment to Exhibit 176 – Transaction Detail/Usage report			
178.	Email dated 5-29-15 Re: Haiti: Senator Steven Benoit			
179.	Email dated 4-14-14 Re: Recharge Haiti			
180.	Usage report			
181.	Email dated 10-25-12 Re: Project Manager Vendor & Country List			
182.	Email dated 8-10-11 Re: Install GW Haiti			
183.	Email dated 7-21-14 Re: Haiti - Status			
184.	Email dated 5-4-15 Re: mistakes in Haiti			
185.	Email dated 7-20-14 Re: Haiti - Status			
186.	Email dated 8-10-11 Re: Install GW Haiti			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
187.	Email dated 8-31-11 Re: New Loc Haiti 3 - Install/config			
188.	Email dated 7-20-14 re: Haiti - Status			
189.	Shipment Details and Charges regarding PINS dated 9-12-11 through 9-18-11			
190.	Email dated 4-13-12 Re: GWs in Haiti			
191.	Email from D. Johnson to D. Tran dated 2-13-15 Re: Haiti			
192.	Email dated 11-16-11 Re: UPS purchase for test Haiti			
193.	Email dated 11-28-14 Re: Development list			
194.	Email dated 8-10-11 Re: Install GW Haiti			
195.	Email dated 7-21-14 Re: Haiti - Status			
196.	Email dated 2-19-16 Re: Haiti 2014			
197.	Attachment to Exhibit 196 - Profits and Loss Report for Digicel Haiti 2014			
198.	Email dated 1-14-16 Re: Article "How to find Termination providers			
199.	Email dated 6-18-14 Re: Haiti low capacity			
200.	Email dated 5-28-14 Re: Haiti low cap			
201.	Email dated 8-3-11 Re: 1 HAITI -DIGICEL-EMIDA-Recharge-with \$7.00 Aug 3 By Deiby			
202.	Email dated 5-28-14 Re: Haiti low cap			
203.	Email dated 5-28-14 Re: Haiti low cap			
204.	Email dated 9-8-14 Re: Haiti message			
205.	Email dated 11-18-11 Re: Fwd: Voila Haiti outage			
206.	Email dated 9-27-14 Re: Haiti Digicel Mobile			
207.	Email dated 8-5-14 Re: Haiti recharges wrong amount			
208.	Email dated 12-16-11 Re: 2 DIGICEL HAITI - TEST-Recharge with\$8.00 Dec 16 by dEIBY			
209.	Email dated 10-9-13 Re: TransferTo - Digicel - Haiti - Quintuple (5x) Bubble - October 11-13 2013			
210.	Destination Chart with Rate Included and Effective date of 5-9-11			
211.	Chart - API Top up prices dated 2012-11-13			
212.	Email dated 9-30-13 Re: TransferTo - Digicel - Haiti - Monday - Thursday Promotion			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
213.	Email dated 12-17-15 Re: Top up rates - December 17 2015 - Digicel prices and reseller discount			
214.	Chart - Top Up API Prices dated 2014-11-21			
215.	EZETop Phone card with Digicel as a provider (front)			
216.	EZETop Phone card with Digicel as a provider (back)			
217.	Email dated 8-14-11 Re: Haiti first LOC install experience...			
218.	Detail Product/Carrier Chart - 08-2014 – 11-2014			
219.	Email dated 5-9-12 Re: Haiti fiasco update.			
220.	Email dated 9-13-11 Re: shipment Teles GWs haiti			
221.	Email dated 11-16-11 Re: Haiti weekly snapshot since Oct 1st			
222.	Email dated 8-14-11 Re: Haiti first LOC install experience...			
223.	Email dated 8-18-11 Re: Haiti Install Experience.. Part II			
224.	Email dated 8-9-11 Re: I have shared an Evernote notebook with you			
225.	Email dated 9-20-11 Re: Haiti rates			
226.	Email dated 11-20-11 Re: Hait Digicell route not working - all 34s			
227.	Email dated 2-28-12 Re: updated			
228.	Attachment to Exhibit 227 - Haiti Comcel Call Report			
229.	Email dated 4-29-14 Re: Fwd: Haiti			
230.	Email dated 5-15-14 Re: Fwd: DIGICEL HAITI TRIPLE BUBBLE weekend + Free Intl calls to USA/Canada			
231.	Attachment to Exhibit 230 –Digicel top up Advertisement (Creole)			
232.	Attachment to Exhibit 230 - Digicel top up Advertisement (English)			
233.	Email from K. Rohner to J. Gosal dated 8-19-11 Re: Haiti			
234.	Email dated 11-20-11 Re: Hait Digicell route not working - all 34s			
235.	Email dated 8-11-11 Re: internet Service			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
236.	Email dated 9-20-11 Re: Haiti rates			
237.	Table - IMSI Call Log Report- 4-30-14 - 6-20-14			
238.	Composite Exhibit - UPM Technology Inc. Batch Invoices for April 2014			
239.	Composite Exhibit - UPM Technology Inc. Batch Invoices for May 2014			
240.	Composite Exhibit – UPM Technology Inc. Invoices for June 2014			
241.	Composite Exhibit – UPM Technology Inc. Invoices for July 2014			
242.	Composite Exhibit – UPM Technology Inc. Invoices for August 2014			
243.	Composite Exhibit – UPM Technology Inc. Invoices for October 2014			
244.	Composite Exhibit – UPM Technology Inc. Invoices for November 2014			
245.	Composite Exhibit – UPM Technology Inc. Invoices for December 2014			
246.	Tata Communications - USF Exemption/Reseller Certification - Calendar Year 2015			
247.	Tata Communications - Clarification of Supplier Rate Contact Information Form – Executed by J. Kohn 4-5-17			
248.	Letter from R. Miller re: Exemption Certificate details for Customer: UPM Marketing Inc.			
249.	Tata Communications - Clarification of Supplier Rate Contact Information Form – Executed by B. Tran 1-13-15			
250.	Tata Communications - Telecommunication Services Agreement dated 2-4-11 – Executed by B. Sanchez 2-14-11			
251.	Letter from R. Miller re: Exemption Certificate details for Customer: UPM Marketing Inc. dated 7-1-14			
252.	Email dated 1-18-12 from D. Martin to NOC GT re: HAITI RUTAS			
253.	Email dated 12-30-11 from D. Martin to V. Moscoso			
254.	Email dated 1-16-12 from D. Martin to NOC GT			
255.	Small tools: Caller (“Human Behavior Simulation”) – Project Details (2013) (bates no.: UPM014802-UPM014803)			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
256.	List of new tools and significant features implemented in 2015 – HBS (Human Behavior Simulation), also known as “Caller” (bates no.: UPM14822-UPM14823)			
257.	Caller (“HBS – Human Behavior Simulation”) – Project Details (2013) (bates no.: UPM014833-UPM014834)			
258.	Update on Pending Projects Re: Haiti- 9-26-11			
259.	Email dated 7-1-14 from V. Moscoso to admin gt			
260.	Vendor: Outger Maceus: Dated – Account Statement for May & June 2014			
261.	Vendor: Wakenson Louis: - Account Statement for April & May 2014			
262.	Vendor: Outger Maceus: Account Statement for May, June, & July 2014			
263.	Vendor: Andrew Smith: Account Statement for April, May, June & July 2014			
264.	Email dated 6-4-14 Re: Jesse and Victor May 2014 Pending Sims & Pins			
265.	Email dated 7-24-14 from B. Sanchez to D. Bijlsma Re: Cross border top-ups/recharges (PrepaidUnion.com)			
266.	Email dated 5-29-14 Re: Thursday Case Wells Fargo Project payments			
267.	Email dated 8-14-14 Re: Lema Mamo & Jean Louis Samuel Confirmation 08/14/14			
268.	Vendor: Jean Louis Samuel Account Statement for August 2017			
269.	Email from B. Sanchez to D. Bijlsma dated 7-24-14 Re: Cross border top-ups/recharges (PrepaidUnion.com)			
270.	Email from D. Tran to K. Rohner dated 9-20-11 Re: update on all pending projects			
271.	Email from A. Drain to B. Sanchez dated 11-10-14 Re: FW: On Hold Projects			
272.	Notes - October 12, 2011			
273.	Notes - December 16, 2011			
274.	Notes - November 21, 2011			
275.	Notes - October 31, 2011			
276.	Notes - August 17, 2011			
277.	Notes - November 2, 2011			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
278.	Notes - December 28, 2011			
279.	Notes - December 7, 2011			
280.	Notes - November 16, 2011			
281.	Notes - December 9, 2011			
282.	Notes - August 31, 2011			
283.	Notes - September 21, 2011			
284.	Notes - September 23, 2011			
285.	Notes - December 21, 2011			
286.	Notes - October 24, 2011			
287.	Notes - November 4, 2011			
288.	Notes - December 19, 2011			
289.	Notes - August 29, 2011			
290.	Notes - August 24, 2011			
291.	Notes - October 17, 2011			
292.	Notes - October 5, 2011			
293.	Notes - November 18, 2011			
294.	Notes - October 3, 2011			
295.	Notes - September 19, 2011			
296.	Notes - September 16, 2011			
297.	Notes - November 30, 2011			
298.	Notes - October 10, 2011			
299.	Notes - August 22, 2011			
300.	Notes - October 26, 2011			
301.	Notes - November 23, 2011			
302.	Notes - December 5, 2011			
303.	Notes - December 2, 2011			
304.	Notes - November 28, 2011			
305.	Notes - September 12, 2011			
306.	Notes - September 26, 2011			
307.	Email from D. Tran to A. Xela dated 3-31-15 Re: It's me....the guy in Gmala			
308.	Email from D. Tran to J. Kohn dated 8-4-11 Re: Haiti - Auth			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
309.	Email from D Tran to J. Kohn and J. Del Toro dated 3-29-15 Re: Fwd: Time to answer your questions			
310.	Email from D. Tran to A. Xela dated 3-30-15 Re: It's me....the guy in Gmala			
311.	Email from D. Tran to A. Xela dated 3-31-15 Re: It's me....the guy in Gmala			
312.	Email from M. Del Toro to M. Prince, A. Drain, and E. Machuca dated 11-10-14 Re: On Hold Projects			
313.	Email from D. Floeckinger to D. Tran dated 8-22-14 Re: Agreement.			
314.	Email dated 1-27-15 from J. Kohn to D. Tran Re: Fwd. Liberia MTN new test			
315.	Email from M. Del Toro to S. Del Toro, J. Gosal, V. Moscoso, and D. Yannoucos dated 11-10-14 Re: On Hold Projects			
316.	CONFIDENTIAL - Communication from D. Flockinger to D. Tran			
317.	Email from K. Herrera to J. Gosal dated 5-28-14 Re: POs details - week: 26/5 to 1/6			
318.	Email from K. Herrera to J. Gosal dated 7-9-14 Re: POs details - week: 07 to 13/06			
319.	Email from K. Herrera to J. Gosal dated 7-16-14 Re: POs details - week: 14 to 20/07			
320.	Email from K. Herrera to J. Gosal dated 7-24-14 Re: POs details - week: 1 to 27/07			
321.	Email dated 2-6-12 from K. Herrera to J. Gosal			
322.	Attachment to Exhibit 321 - 01/2012 - 04/2012 Haiti Digicel Gross Profit & Weekly Gross			
323.	Email from S. Del Toro to J. Gosal dated 8-15-11 Re: Haiti first LOC install experience...			
324.	Email dated 10-24-11 Re: Summary Pnm, Haiti			
325.	Document Placeholder - [20161202010417583][GBR_VZB-USA_UPM][PL][USD][UK_UPM PRM USD][1]FinalPL.xlsx			
326.	Email dated 11-16-11 Re: Digicel ports Haiti			
327.	Certificate and translated Email dated 11-16-11 Re: Digicel ports Haiti (translation of Exhibit 117)			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
328.	Certificate and translated Email dated 12-11-11 Re: HAITI DIGICEL (translation of Exhibit 120)			
329.	Certificate and translated Email dated 11-16-11 Re: Digicel ports Haiti (translation of Exhibit 326)			
330.	Certificate and translated Email dated 10-19-11 Re: Digicel ports Haiti (translation of Exhibit 144)			
331.	Certificate and translated document to Email dated 10-19-11 Re: Digicel ports Haiti (translation of Exhibit 145)			
332.	termes et conditions -service prepaye Digicel-sept 2015			
333.	CONTRAT PapPadap			
334.	Contract de Cabanet Cyber Cafe			
335.	Contrat Digikiosk			
336.	Lettre Conatel à Mark Shield - 5 Fev. 2015			
337.	Certificate of Translation - Terms and Conditions (translation of Exhibit 332)			
338.	Certificate of Translation - Distribution Contract for Electronic Recharge (translation of Exhibit 333)			
339.	Certificate of Translation - Contract Validation Form (translation of Exhibit 334)			
340.	Certificate of Translation - Contract - Unigestion Holdings S.A. and Digicel (translation of Exhibit 335)			
341.	Certificate of Translation - Conatel Letter to Mark Shield (translation of Exhibit 336)			
342.	Declaration of D. Tran In Support of Motion for Leave to Add Affirmative Defenses (DE 240)			
343.	Declaration of B. Tran as CEO of UPM In Support of UPM's Motion for Summary Judgment (DE 256)			
344.	Declaration of B. Ruiz In Support of Defendant UPM's Motion for Summary Judgment (DE 260)			
345.	Declaration of B. Sanchez In Support of Defendant's Motion for Summary Judgment (DE 261)			
346.	Declaration of Duy-Bruce-Tran In Support of Individual Defendant's Motion for Summary Judgment (DE 262)			
347.	Composite Exhibit - Example of Suspected UPM Deployment by Kenneth McEwen (Figure 4 of Kenneth McEwen Expert Report)			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
348.	Composite Exhibit - Traditional LCR SIMBank solution by Kenneth McEwen (Figure 1 of Kenneth McEwen Expert Report)			
349.	Composite Exhibit - Distributed SIMBank Solution by Kenneth McEwen (Figure 2 Kenneth McEwen of Expert Report)			
350.	Composite Exhibit - Distributed SIMBank Call Process by Kenneth McEwen (Figure 3 of Kenneth McEwen Expert Report)			
351.	Composite Exhibit - Illustration of GSM Bypass Fraud by Charles Castel (Figure 2 of Charles Castel Expert Report)			
352.	Composite Exhibit - Illustration of SIMBOX by Charles Castel (Figure 7 of Charles Castel Expert Report)			
353.	Composite Exhibit - Illustration of Normal course of operations vs VOIP and GSM Bypass fraud by Charles Castel (Figure 1 Expert Report)			
354.	Composite Exhibit - Illustration of Bypass SIMBOX Fraud by Charles Castel (Figure 3 of Charles Castel Expert Report)			
355.	Composite Exhibit - Risks exposure to telecom fraud by Charles Castel (Table 1 of Charles Castel Expert Report)			
356.	Composite Exhibit - Digicel Bypass Damages Scenarios by Charles Castel (Table 2 of Charles Castel Expert Report)			
357.	Composite Exhibit - Digicel financial losses due to Bypass by Charles Castel (Graph 1 of Charles Castel Expert Report)			
358.	Composite Exhibit - Digicel Bypass losses Table by Charles Castel (Table 3 of Charles Castel Expert Report)			
359.	Composite Exhibit – Digicel Financial Info Table by Charles Castel (Table 4 of Charles Castel Expert Report)			
360.	INTENTIONALLY LEFT BLANK			
361.	iQsim – IRON SIM Server One Technical Manual			
362.	iQsim – IRON SIM Server One Technical Manual			
363.	iQsim – IRON SIM Server One Technical Manual			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
364.	iQSim – IRON Management Interface Administration Guide			
365.	Email dated 9-19-14 Re: Haiti Inband – Update			
366.	Email dated 8-9-11 re: vGATE Routing Manager (vRM). (with attachement)			
367.	Teles Informationstechnologien – vGATE Reference Manual (Software version 17.0)			
368.	Email dated 12-17-14 Re: Fwd: Re: Gateway configuration for incoming calls termination			
369.	Teles Informationstechnologien – vGATE Reference Manual (Software version 16.2)			
370.	Email dated 12-17-14 Re. Gateway configuration for incoming calls termination			
371.	Teles Informationstechnologien – vGATE Reference Manual (Software version 17.0)			
372.	Teles Informationstechnologien – vGATE Reference Manual (Software version 17.0)			
373.	iQsim – IRON SIM Server One Technical Manual			
374.	Teles Informationstechnologien – vGATE Reference Manual (Software version 17.0)			
375.	Email dated 4-19-12 Re: Hypermedia Q2, 2012 News & Offers			
376.	SIM Server Memo			
377.	Email dated 11-17-11 Re: Bulk SMS Hardware – The New Opportunity for Termination Business			
378.	Email dated 11-17-11 Re: Bulk SMS Hardware – The New Opportunity for Termination Business			
379.	Email dated 10-6-11 Re: Fwd: iQsim offer – 32 ports and 64 ports with 128 SIMs (with attachments)			
380.	Email dated 2-23-12 Re: New Opportunity from Hypermedia – Bulk SMS Hardware platform			
381.	Teles Manuals vGATE – Software 16.0			
382.	Teles Informationstechnologien – vGATE Reference Manual (Software version 16.2)			
383.	Teles Manuals vGATE – Software 16.1			
384.	Teles Manuals vGATE – Software 16.1			
385.	Teles Manuals vGATE – Software 16.1			
386.	Teles Manuals vGATE – Software 16.1			
387.	Teles Manuals vGATE – Software 16.0			
388.	Teles Manuals vGATE – Software 16.1			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
389.	Email dated 6-3-10 Re: EMIDA API			
390.	Distributor Agreement – Contract Validation Form from August 2013 through August 2015			
391.	Distribution Agreement – Electronic Recharge Code Distribution Contract			
392.	digiSelect Terms & Conditions – Version 1.0 Post Paid Contract			
393.	Unigestion Holdings License - Unexecuted			
394.	Digicel Haiti's Prepaid Roaming Service Plans, and Terms & Conditions			
395.	Certificate of Translation with Translation – Phone Recharge Code Agreement (translation of Exhibit 391)			
396.	Certificate of Translation with Translation – Terms and Conditions of Phone Service Agreement			
397.	Certificate of Translation with Translation – General Terms and Conditions of the Prepaid Service			
398.	General Terms and Conditions of Digicel Haiti Online Top-Up for Haiti			
399.	Digicel Group Flyers			
400.	Police Report – July 2014			
401.	Police Report Photographs – July 2014			
402.	Composite Exhibit – Lettre(s) Conatel – Conseil National Des Telecommunications to Monsieur Maarten Boute with Invoices			
403.	Order from the Port-au-Prince Court of Appeals with Record on Appeal dated 2015-04-24			
404.	Prepaid Digicel SIM Card			
405.	CONATEL Article – Dismantling of Networks Specialized in the Circumvention of International Telephone Traffic			
406.	Article – Haiti Libre – Haiti-Justice: Dismantling of International Traffic Bypass Networks dated 23-08-2014			
407.	Impeachment Exhibit			
408.	Impeachment Exhibit			
409.	Impeachment Exhibit			
410.	Impeachment Exhibit			

EXHIBIT NO.	DESCRIPTION	MARKED	OFFERED	REC'D
411.	Impeachment Exhibit			
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430.	Impeachment Exhibit			
431.	Impeachment Exhibit			

Dated this 13th day of November, 2022.

Respectfully submitted,

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